

## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Marquan Martice-Antquan Cox

Case No. 4:24-mj-30330  
 Judge: Ivy, Curtis  
 Filed: 08-09-2024

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 31, 2020-October 2021 in the county of Genesee in the  
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 2251(a) and (e);	Sexual exploitation of a minor;
18 U.S.C. § 2422(b);	Coercion and enticement of a minor;
18 U.S.C. § 2252A(a)(2); &	Distribution of child pornography; and
18 U.S.C. § 2252A(a)(5)	Possession of child pornography

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.

  
 Complainant's signature

Special Agent Michael Wiggins-FBI

Printed name and title

Sworn to before me and signed in my presence  
 and/or by reliable electronic means.

Date: August 9, 2024

City and state: Flint, Michigan



Judge's signature

Curtis Ivy, Jr, United States Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF**  
**AN APPLICATION FOR A CRIMINAL COMPLAINT**  
**AND ARREST WARRANT**

I, Michael S. Wiggins, a Special Agent with the Federal Bureau of Investigation, being duly sworn, depose and state as follows:

1. I am a Special Agent (SA) of the Federal Bureau of Investigation (FBI), United States Department of Justice (DOJ). I have been so employed since March 2004. I am currently assigned to the FBI's Detroit Division, Flint Resident Agency (FLRA) as the Coordinator and a member of the Northeast Michigan Trafficking and Exploitation Crimes Task Force (NEMTEC) which is a Federal Bureau of Investigation (FBI) managed task force. It is tasked with addressing Crimes Against Children and Human Trafficking threats in coordination and cooperation with its local and state partners. As part of my employment, I have received training in and been involved in investigations regarding human trafficking, exploitation of children, drug trafficking, money laundering, threats, financial crimes, crimes involving gang related activities, child pornography and other violations of federal law. I have been involved with several investigations regarding child pornography and the exploitation of children through the internet. I have observed and reviewed numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media including computer media.

2. This affidavit is made in support of an application for a criminal complaint and arrest warrant for Marquan Martice-Antquan Cox for violations of 18 U.S.C. § 2251(a) and (e) (sexual exploitation of a minor), 18 U.S.C. § 2422(b) (coercion and enticement of a minor), 18 U.S.C. § 2252A(a)(2) (distribution of child pornography), and 18 U.S.C. § 2252A(a)(5) (possession of child pornography).

3. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information made available to me by other law enforcement professionals. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint and arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause for the requested complaint and arrest warrant.

4. In 2021, the Genesee County Sheriff's Office (GCSO) received information that Marquan Martice-Antquan Cox and another identified individual (Subject2) had communicated online with and sexually exploited minor victims, and attempted to do so.

5. In or around October 2021, an identified minor victim (MV1), who was between the ages of 13 and 15 years old, reported that MV1 had met Subject2 and Cox online earlier in 2021, and that Subject2 had persuaded MV1 to send nude

images of MV1's genitalia to Subject2. Thereafter, Subject2 continued to communicate with MV1 via the Internet in an attempt to coerce and entice MV1 to meet Cox and Subject2 to engage in sexual conduct. After MV1 refused, Cox sent nude photographs of MV1 to MV1's family members using Facebook Messenger.

6. During the investigation, another identified minor victim (MV2), who was between the ages of 13 and 15 years old, reported that, in or around August and September 2021, MV2 had similarly met Subject2 and Cox on the Internet and that Subject2 persuaded MV2 to send nude photographs to Subject2. Thereafter, Subject2 enticed and coerced MV2 to come to Cox's residence. Subject2 told MV2 that MV2 would need to go to Cox's residence to have the nude photographs deleted, and that the nude photographs would be sent to MV2's family members if MV2 did not comply. On at least one occasion, MV2 was forced to engage in sex with Cox after being coerced to go to Cox's residence.

7. During the GCSO investigation, GCSO obtained state search warrants for locations and property associated with Cox and Subject2. GCSO seized several cellular telephones used by Cox and Subject2. These devices were forensically analyzed and reviewed.

8. One of the devices was a cellular telephone that included user account information associated with Subject2. A review of this device revealed at least two

videos, dated on or about August 12, 2021, which depicted Subject2 engaging in sexual activity with an identified minor victim (MV3), who was less than six years old at the date of the recording. One such video showed Subject2 performing oral sex on MV3, whose genitalia are visible in the video. A male voice can be heard in the background stating, “You like that? Yeah. You can’t tell nobody...” Based on the investigation and on information from other law enforcement officers, this male voice appears to be Cox’s voice.

9. On another cellular phone that included user account information associated with Cox, law enforcement located a video with a different name which appeared to be identical in content to the video of MV3 described in paragraph 8.

10. On another cellular telephone that included user account information associated with Cox, law enforcement observed additional videos that meet the federal definition of child pornography. Some of the videos are described as follows:

- (a) There were approximately four videos, dated on or about March 31, 2020, depicting an identified victim (MV4), who was less than six years old at the date of the recording. GPS location data show these videos were recorded at Cox’s residence in Flint, Michigan. The videos appear to have been recorded using the device on which they were found. In at least one of these videos, a hand with a tattoo that

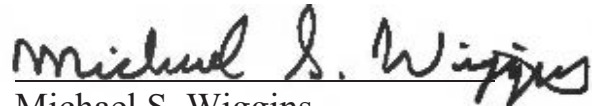
appears to match a tattoo on Cox's hand is seen rubbing the genital area of MV4. In another video, Cox's hand can be seen pulling down MV4's pants while the camera is moved closer to MV4 to zoom in on MV4's nude genitalia. Near the end of the video, Cox's leg is visible and is seen wearing a GPS tether device. Tether data show that Cox was at his residence when the videos were recorded.

(b) There were approximately three videos, dated on or about January 17, 2021, which depict the nude genitalia of a minor victim (MV5), who appears to be less than six years old. In one of the videos, two individuals' hands are seen touching and digitally penetrating MV4's genitalia. Based on a review of other videos in which Cox is identifiable and his hands are visible, one of the hands in this video appears to be Cox's hand.

(c) There were multiple videos, dated on or about May 9, 2021, which depicted MV4, who was less than six years old at the date of the recording, being sexually assaulted. In at least one of these videos, MV4's genitalia are visible during the video. A left hand can be seen holding and rubbing an erect penis against MV4's genitalia until ejaculation. Based on a review of other videos in which Cox is

identifiable and his hands are visible, the hand in this video appears to be Cox's hand.

11. Based on the aforementioned facts, there is probable cause to believe that Marquan Martice-Antquan Cox committed violations of 18 U.S.C. § 2251(a) and (e) (sexual exploitation of a minor), 18 U.S.C. § 2422(b) (coercion and enticement of a minor), 18 U.S.C. § 2252A(a)(2) (distribution of child pornography), and 18 U.S.C. § 2252A(a)(5) (possession of child pornography).

  
Michael S. Wiggins  
Special Agent

Sworn to before me and signed in my presence  
and/or by reliable electronic means on August 9, 2024.



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Hon. Curtis Ivy, Jr.  
United States Magistrate Judge